UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
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NEW YORK, NY 10007-1866

March 8, 2004

By E-mail and
Regular Mail

Rick Mustico, Project Manager
New York State Department of
Environmental Conservation
625 Broadway, 12th Floor
Albany, NY 12233-7016

Re: PSA Work Plan - January 2004
Crouse Hinds Landfill

Dear Mr. Mustico:

The U.S. Environmental Protection Agency (EPA) has reviewed the above document and comments are provided below.

General Comments

G.1 The PSA work plan should include a section which identifies potential applicable or relevant and appropriate requirements (ARARs) and to be considered (TBC) criteria, advisories, guidance, and proposed standards.

G.2 The PSA should include a reconnaissance of the site to determine the presence of any seeps emanating from the landfills. Surface water/sediment samples should be collected from any identified seeps.

G.3 The PSA data needs should consider include the collection of landfill gas data, particularly in the South Landfill since it received large quantities of municipal solid waste over a three or four year period. This data would be useful in the evaluation of an active versus a passive gas control system if a landfill cover is to be constructed over the landfills.

G.4 Future documents should consider potential impacts to cultural resources through site remediation. While this site is not currently a subsite, EPA is available to provide comments and recommendations as to the need for and scope of any needed cultural resource investigations.

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Specific Comments

3.1 Page 3-1, Section 3.0. The Work Plan should identify the objectives of the PSA. The objectives should include the following.

- collect the data necessary to determine the presence of hazardous wastes and/or hazardous substances in site media;
- collect the data necessary to determine if the site is a source of hazardous wastes and/or hazardous substance contamination to Ley Creek and/or Onondaga Lake;
- collect sufficient data to determine whether a Remedial Investigation/Feasibility Study is warranted for the site;
- collect the data necessary to perform the Fish and Wildlife Impact Analysis (FWIA); and
- collect the data necessary to enable the Department and EPA to determine whether the site warrants further investigation due to potential impacts to the Onondaga Lake NPL Site.

3.2 Page 3-5, Section 3.2.3. At what depth will the proposed surface soil samples be collected? If it is anticipated that the data are to be used to support a baseline human health risk assessment, then the sampling depth should be consistent with the appropriate depth for exposure to surface soils based on likely exposure activities.

3.3 Page 3-6, Section 3.3.1, Paragraph 4. If the existing wells are no longer useable, then there should be a contingency to replace them with new wells.

3.4 Page 3-6, Section 3.3.2, Paragraph 5. Since monitoring well W-4A is not an upgradient well in the shallow aquifer during the winter months and is installed in fill containing foundry waste, this well should not be considered as a background well as recommended in the Thomsen Associates report. Also, since monitoring well W-4B is the only deep aquifer downgradient well during the summer months, the installation of one or two additional deep wells on the northeast side of the North Landfill should be considered. In the South Landfill, there are only three monitoring wells and it is unclear which aquifer(s) they are screened in. Additional wells may be needed in the South Landfill to fully characterize the extent of groundwater contamination in this area. Also, why are no wells proposed for the areas of the site between the fill and Ley Creek? This section should discuss the rationale for the placement and number of wells as it relates to PSA data needs.

3.5 Page 3-7, Section 3.3.3, Paragraph 4. The discharge of development water on-site unless a sheen or free product is observed is not acceptable. All decontamination waters need to be collected and characterized to identify the appropriate means of disposal.

3.6 Page 3-8, Section 3.3.4, Paragraph 1. The discharge of purged water onsite unless a sheen or free product is observed is not acceptable. All purged water needs to be collected and characterized to identify the appropriate means of disposal.

3.7 Page 3-8, Section 3.3.4, Paragraph 2. Low-flow sampling should be employed for groundwater sampling. Purging rates should be 200-500 ml/min according to EPA Region II's low stress groundwater purging and sampling procedure.

3.8 Page 3-9, Section 3.4, Paragraph 1. Two of the four Ley Creek surface water/sediment samples appear to be located immediately upstream and downstream of the Seventh North Street bridge. These samples should be moved further upstream and downstream to reduce any potential bias related to road runoff. Also, in order to evaluate the impacts of the site to Ley Creek and Onondaga Lake, additional surface water/sediment samples upgradient and downgradient of the site should be collected.

3.9 Figure 3-1. This figure should include labels for all test pits, monitoring wells and sediment/surface water sampling locations. It should also use different symbols to distinguish between existing groundwater wells installed in the peat deposits aquifer (W-1, W-2, W-3, W-4A, W-6A, and W-8A) and wells installed in the sand and gravel aquifer (W-4B, W-5, W-6B, W-7, and W-8B).

3.10 Figure 3-2. This figure should include labels for all test pits, monitoring wells and sediment/surface water sampling locations.

A1.1 Attachment 1. Other than Figure 2, all the figures in and appendices to the Thomsen Associates report were not provided in our copies. Please submit these pages.

A2.1 Attachment 2, SAP, Page 2-5, Section 2.3.3, Paragraph 1. The discharge of development water on-site unless a sheen or free product is observed is not acceptable. All decontamination waters need to be collected and characterized to identify the appropriate means of disposal.

A2.2 Attachment 2, SAP, Page 2-5, Section 2.3.4, Paragraph 2. The discharge of purged water onsite unless a sheen or free product is observed is not acceptable. All purged water needs to be collected and characterized to identify the appropriate means of disposal.

A2.3 Attachment 2, SAP, Page 2-5, Section 2.3.4, Paragraph 3. Low-flow sampling should be employed for groundwater sampling. Purging rates should be 200-500 ml/min according to EPA Region II's low stress groundwater purging and sampling procedure.

A2.4 Attachment 2, SAP, Page A-3, Section 3.0. EPA Region 2 recommends that volatile organic carbon (VOC) soil samples be collected using an Encore™ sampler, or similar tube or plunger type sampler, since it eliminates the loss of volatile organic compounds (VOCs) which occur during transfer of material to the sampling tool to the sample container. The sampling device is inserted into undisturbed soil, such as a retrieved split spoon or directly into the exposed soil surface. The 5-gram plug of soil (approximately) is then capped and sent to the laboratory where it will be preserved, extracted and analyzed. Volume requirements under the current

CLP method states that three (3) Encore™ vials and one (1) unpreserved 60 ml jar be sent per sample location.

A3.1 Attachment 3, QAPP, Page1-1, Section 1.0. This section should cite appropriate guidance documents used to develop the QAPP (i.e. "EPA Requirements for the Preparation of Quality Assurance Project Plans", EPA QA/R-5, Interim Final, November 1999).

A3.2 Attachment 3, QAPP, Page 6-2, Table 6-1. This table should include the proposed test pit samples discussed in the QAPP, Section 2.2.2 which will be collected and analyzed by the Toxicity Characteristics Leaching Procedure (TCLP).

If you have any questions, please contact me at (212) 637-4254.

Sincerely yours,

Robert Nunes
Project Manager